VZCZCXYZ0021 RR RUEHWEB

DE RUEHC #3990 0931556 ZNR UUUUU ZZH R 021550Z APR 08 FM SECSTATE WASHDC TO RUEHHE/AMEMBASSY HELSINKI 0000 INFO RUEAIIA/CIA WASHINGTON DC 0000 RUCPDOC/USDOC WASHINGTON DC 0000 RUEKJCS/SECDEF WASHINGTON DC RHMCSUU/FBI WASHINGTON DC 0000 RUEPINS/HQ BICE INTEL WASHINGTON DC

UNCLAS STATE 033990

SIPDIS

SIPDIS HELSINKI FOR GLENN LEWIS

E.O. 12958: N/A

TAGS: ETTC FI KOMC SUBJECT: BLUE LANTERN LEVEL 3: PRE-LICENSE END-USE CHECK

ON APPLICATION 050093514

REF: BLUE LANTERN GUIDEBOOK 2006

- 11. This is an Action Request. See paragraphs 2-4.
- 12. The Department's Office of Defense Trade Controls Compliance (PM/DTCC) requests post's assistance in conducting a pre-license check on application 050093514 for the export of diving equipment to Finland. Post is requested to complete this Blue Lantern check within 30 days. Lack of response to a Blue Lantern check will affect pending and future applications involving parties to this license.
- ¶3. Reason for request: Unfamiliar foreign consignee, Polarsukellus Oy. Post should make appropriate inquiries to verify the bona fides of Polarsukellus Oy and confirm the legitimacy of the proposed transaction. The following questions are provided as suggested guidance:

For the Finnish MOD:

- --Did you order from Polarsukellus Oy the exact type and quantity of items listed on this application?
- --Is Polarsukellus Oy an official supplier/contractor for the Finnish MOD? Does the MOD have any other contracts with the company?

For Polarsukellus Oy:

- --Does the company have proper supporting documentation, including purchase orders from the Finnish MOD, for this proposed transaction?
- --Will the company be handling or storing the items listed on the application? If so, does it have secure facilities and proper accounting and security procedures for handling these sensitive USML items?
- --When was the company established and who are its principals?
- --What is the nature of its business -- what types of items does it handle, does it serve as a broker?
- --What types of organizations are among its typical customers and where are the customers located? Does the company have an established customer base?
- -- Does the company keep proper, detailed records of its sales and customers?
- --Does the company understand the restrictions on United States Munitions List (USML) items, especially the

prohibition against unauthorized re-transfers and re-exports?

- 14. Department requests that post conduct a site visit to the company in order to provide Department with an assessment of its business operations and on-site security. If a site visit is not possible, please inform PM/DTCC case officer. Finally, post is asked to assess whether the company appears to be a reliable recipient of USML items. End action.
- 15. For background, the following details of the license in question are provided:

DTC Case: 050093514

OUANTITY/COMMODITY:

- 1 P/N 1328-xxxx Siva Series, S-10 Closed Circuit Apparatus, S-24 Multi-Roll Shallow Water/MCM Diving Apparatus, Diving Equipment and related spare parts.
- $1\ P/N\ 2400-xxxx$ Viper Series Viper SC Underwater Mine Countermeasures Diving Apparatus, E Mixed-Gas Underwater Breathing Apparatus, Diving Equipment and related spare parts.

License Value: USD \$3,000,000.00

SELLER:

Cobham Holdings Inc. 10 Cobham Drive Orchard Park, NT 14127

Subsidiary:

Carleton Life Support Systems 2734 Hickory Grove Road Davenport, IA 52804

FOREIGN CONSIGNEE:

Polarsukellus Oy Rusthollarinkatu 8 FIN 02270 Espoo Finland Tel 358-9-613316

FOREIGN END-USER:

Finnish Gulf Naval Command Hankintakeskus, PL5 FIN 02471 Upinniemi Finland

PURPOSE:

For use by the Finnish Navy in counter terrorism and underwater mine countermeasures. Also for use by Polarsukellus Oy and Finnish Navy for repair of dive equipment.

- 16. Submitted in support of the license application were the following documents (PM/DTCC can fax documentation to post upon request):
- Letter of Intent from Polarsukellus Oy dated 01/10/2008 signed by Egil Osterholm.
- End-Use Statement from Polarsukellus Oy listing Finnish Gulf Naval Command as End-User. Signed by Egil Osterholm dated 01/10/2008.
- Product Brochures and Technical Data
- Letter of Explanation from Carleton Life Support Systems to PM/DDTC dated 03/12/2008 signed by Kathleen K. Nimrick
- 17. Please slug reply for PM/DTCC BLUE LANTERN COORDINATOR and include the words "Blue Lantern" and the case number in

the subject line. POC is Judd Stitziel, PM/DTCC, Phone: 202-663-3455; email: StitzielJD@state.gov; SIPRNET: StitzielJD@state.sgov.gov. The Blue Lantern Guidebook (ref) is available as a PDF file in the Bunche Library's Electronic Library collection on the DOS Intranet: http://virtuallibrary.state.gov/BlueLanternGuidebook2006%2520 final .pdf

 $\underline{ \ } 18.$ Department is grateful for post's assistance in this matter. RICE